

**To:** Massachusetts Board of Fire Prevention (BFPR)  
Massachusetts Board of Building Regulations and Standards (BBRS)

**From:** Chris Rovenstine, Director of Marketing and Communications –  
Kidde Residential and Commercial Division

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**Subject:** Testimony to the joint meeting of BFPR and BBRS on Smoke Alarm  
Performance and Smoke Characterization Study

My name is Chris Rovenstine, Director of Marketing for Kidde's Residential and Commercial Division. I appreciate the opportunity to be here today and commend Fire Marshal Coan, the members of the Board of Fire Prevention and Board of Building Regulations and Standards and today's participants for contributing to this discussion.

The mission of Kidde's Residential and Commercial Division is to apply its resources to protect people and property from fire and its related hazards. For 90 years, Kidde has been a leader in the manufacturing of fire suppression and detection products servicing aerospace, military, residential and commercial applications. Kidde's primary product categories include smoke alarms, carbon monoxide alarms, fire extinguishers and escape ladders.

There are specific UL performance standards for each of these product categories which are influenced by independent regulatory bodies such as NFPA, CPSC and NIST. In fact many states require that manufacturer's products be listed to these UL standards prior to being offered for sale.

Kidde designs and manufactures smoke alarms that meet the UL 217 standard. Over the years this performance standard has evolved based on the ongoing objective of reducing deaths and injuries from fire. National statistics demonstrate that fire deaths in this country have decreased significantly since smoke alarms came into widespread use. In addition to what is reported in the media, Kidde receives hundreds of letters each year from people whose lives were saved by a working smoke alarm.

Today, Kidde manufactures ionization, photoelectric and dual sensor smoke alarms. In 2004, the National Institute of Standards and Technology (NIST) completed a study on photoelectric and ionization smoke alarms, and found both alarms responded to all types of fires. The important fact to remember today is that based on these studies both technologies are effective in providing adequate escape time to occupants in "real life" home fire conditions. Both also must pass identical performance standards in order to obtain third party, UL listing. As both meet the UL listing requirements, Kidde recommends on its packaging, website and in its owner's manuals that consumers install both photoelectric and ionization smoke alarms.

Today, Kidde recommends that any code change under consideration for a life-safety device be supported by rigorous, scientific and independent testing. We also recommend that any changes to the code include a performance based standard rather than one that requires a specific technology. We feel we would be doing a disservice to the public if we allowed a code change that restricted the development of future technology and innovation that could potentially provide even better protection from fire than what is currently on the market today.

Smoke alarms work. We know they work because with widespread use since the 1970's fire fatalities have been cut in half. But we also know that there are still millions of people out there who are not protected at all. In fact, this was evident earlier this year when a prominent state senator from Texas died in a fire in his 50-year-old home because he didn't have working smoke alarms. This unfortunate tragedy did however lead to the passage of a statewide smoke alarm law requiring Texas homes to install alarms.

While today's important topic centers around smoke alarm technology, there are other vital issues to consider. Based on studies and reports that are currently available, it's the placement, the maintenance, the number of alarms, and escape planning that is key to escaping a home fire.

In conclusion, I thank you again for the attention you are bringing to the importance of having and maintaining working smoke alarms.